

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

2019 AUG 14 PM 2:07

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

PARIS LAMONT DENNIS,
a.k.a. "Bama",

Defendant.

§ CRIMINAL NO. EP-19-CR-01357-FM

§
§ SUPERSEDING
§ INDICTMENT

§
§ CT 1: 21: 846 & 841(a)(1)-Conspiracy to
§ Possess a Controlled Substance with
§ Intent to Distribute;
§ CT 2: 21:841(a)(1)-Distribution of a
§ Controlled Substance, Causing Death or
§ Serious Bodily Injury;
§ CT 3: 21:841(a)(1)-Possession with Intent
§ to Distribute a Controlled Substance; and
§ CT 4: 18:922(g)(1) & 924(a)(2)-Possession
§ of Ammunition and/or Firearm by a
§ Convicted Felon.

§
§ *Notice of Government's Demand for*
§ *Forfeiture*

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(C))

That beginning on or about March 1, 2017 and continuing through on or about April 3, 2019, in the Western District of Texas, Defendant,

PARIS LAMONT DENNIS,
a.k.a. "Bama",

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others to the Grand Jury known and unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess a controlled substance, which offense involved cocaine, a Schedule II Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Section 841(a)(1) and the

quantity of the mixture or substance containing cocaine involved in the conspiracy and attributable to Defendant as a result of Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to Defendant is a quantity of a mixture or substance containing a detectable amount of cocaine, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C).

COUNT TWO

(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))

That on or about November 18, 2017, in the Western District of Texas, Defendant,

**PARIS LAMONT DENNIS,
a.k.a. "Bama",**

knowingly and intentionally distributed a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of fentanyl and cocaine, both a Schedule II Controlled Substance, and the use of said substance resulted in death and serious bodily injury of M.O. and R.O., in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))

That on or about April 3, 2019, in the Western District of Texas, Defendant,

**PARIS LAMONT DENNIS,
a.k.a. "Bama",**

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR
(18 U.S.C. §§ 922(g)(1) & 924(a)(2))

That on or about April 3, 2019, in the Western District of Texas, Defendant,

PARIS LAMONT DENNIS,
a.k.a. "Bama",

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, a firearm, that is a Taurus, model 461, .357 caliber revolver, having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. 32.2]

I.

Firearms Violation and Forfeiture Statutes

[Title 21 U.S.C. §§ 846 and 841(a)(1), subject to forfeiture pursuant to Title 21 U.S.C. §§ 853(a)(1) and (2)]

As a result of the foregoing criminal violations set forth above, the United States of America gives notice to the Defendant **PARIS LAMONT DENNIS, a.k.a. "Bama"**, listed in said counts, of its intent to seek the forfeiture of the properties described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 21 U.S.C. §§ 853(a)(1) and (2), which states:

Title 21 U.S.C. § 853. Criminal Forfeiture

(a) Property subject to criminal forfeiture

- (1)** any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2)** any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

II.

Firearms Violation and Forfeiture Statutes

[Title 18 U.S.C. §§ 922(g)(1) and 924(a)(2) & (c)(1)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the foregoing criminal violations set forth above, the United States of America gives notice to the Defendant **PARIS LAMONT DENNIS, a.k.a. "Bama"**, listed in said counts, of its intent to seek the forfeiture of the properties described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). Section 924 states, in pertinent part, the following:

Title 18 U.S.C. § 924.

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection (a)(4), (a)(6), (f), (g), (h), (i), (j), or (k) of section 922, or knowing importation or bringing into the United States or any possession thereof any firearm or ammunition in violation of section 922(I), or knowing violation of section 924, shall be subject to seizure and forfeiture under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the properties described below in Paragraph II.

III.

Property

1. Taurus, model 461, .357 caliber revolver, bearing serial number GW837067; and
2. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offense.

A TRUE BILL
ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY: Phillip Countryman
Assistant U.S. Attorney